

**REMARKS**

Applicants respectfully request further examination and reconsideration in view of the above amendments and arguments set forth fully below. Claims 1-10 were previously pending in the present application. Within the Office Action, Claims 1-10 have been rejected.

**Claim Rejections under 35 U.S.C. § 103 - Smith in view of Crupi**

Also within the Office Action, Claim 1 was rejected under 35 U.S.C. § 103(a) as being unpatentable over United States Patent Application Publication No.: 2002/0128832 to Smith (hereinafter referred to as "Smith") in view of United States Patent No. 6,195,636 to Crupi et al. (hereinafter referred to as "Crupi").

To establish a *prima facie* case of obviousness of a claimed invention, all the claimed features must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). The Applicants respectfully traverse this rejection, because neither Smith nor Crupi, either alone or in combination, disclose all of the limitations of Claim 1.

Specifically neither Smith nor Crupi teach or suggest a:

"language processing device comprising a processing and memory module ... configured with a plurality of discrete memory locations comprising each of: a settings memory containing data representing operational parameters including each of: a language setting comprising one or more language selected by the user of said language processing device; and an input mode setting comprising one or more input mode selected by the user of said language processing device; and an input buffer containing data representing key strokes used in specifying a message unit; a candidate buffer configured for storing candidate interpretations of user input gestures; a word buffer configured for storing message units specified by said user; a component buffer

configured for storing data components of message units; an input interpretation database containing input gesture data; and a font store containing data representing properly represented characters... wherein said processing and memory module is configured to perform language-specific tasks at the request of the appliance by: receiving an instruction for language-specific processing from the appliance in the form of an application program interface (API) call, wherein said API call references said plurality of discrete memory locations."

Smith involves a speech module electronically coupled with a host device, wherein the speech module comprises memory, in general. However, Smith does not organize a speech module into a plurality of discrete memory locations based on a specific API call that references the memory locations. Indeed, it is not obvious to do so. Likewise, Crupi does not teach or suggest these limitations, nor does the Examiner suggest that he does.

#### **Claim Rejections under 35 U.S.C. § 103 - Coon in view of Crupi**

Also within the Office Action, Claims 1, 3-6, and 10 were rejected under 35 U.S.C. § 103(a) as being unpatentable over United States Patent No.: 6,539,358 to Coon et al. (hereinafter referred to as "Coon") in view of Crupi. The Applicants respectfully traverse this rejection, because neither Coon nor Crupi, either alone or in combination, disclose all of the limitations of Claims 1, 3-6, and 10.

Specifically neither Coon nor Crupi teach or suggest a:

"language processing device comprising a processing and memory module ... configured with a plurality of discrete memory locations comprising each of: a settings memory containing data representing operational parameters including each of: a language setting comprising one or more language selected by the user of said language processing device; and an input mode setting comprising one or more input mode selected by the user of said language processing device; and an input buffer containing data representing key strokes used in specifying a message unit; a candidate buffer

configured for storing candidate interpretations of user input gestures; a word buffer configured for storing message units specified by said user; a component buffer configured for storing data components of message units; an input interpretation database containing input gesture data; and a font store containing data representing properly represented characters... wherein said processing and memory module is configured to perform language-specific tasks at the request of the appliance by: receiving an instruction for language-specific processing from the appliance in the form of an application program interface (API) call, wherein said API call references said plurality of discrete memory locations."

Coon involves a voice-interactive docking station for a portable computing device that includes a speech input device, a speech recognizer, an interface application, and a text to speech synthesizer; however, Coon does not organize a speech module into a plurality of discrete memory locations based on a specific API call that references the memory locations, nor does the Examiner suggest that he does. Likewise, as explained above, Crupi does not teach or suggest these limitations.

#### **Claim Rejections under 35 U.S.C. § 103 – Coon, Crupi in view of Ito**

Also within the Office Action, Claims 2 and 7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Coon in view of Crupi, and further in view of United States Patent No.: 6,243,675 to Ito et al. (hereinafter referred to as "Ito"). The Applicants respectfully traverse this rejection, because neither Coon, Crupi, nor Ito, either alone or in combination, discloses all of the limitations of Claims 2 and 7.

As explained above, neither Coon nor Crupi teach or suggest a "language processing device comprising a processing and memory module ... configured with a plurality of discrete memory locations comprising each of: a settings

memory containing data representing operational parameters including each of: a language setting comprising one or more language selected by the user of said language processing device; and an input mode setting comprising one or more input mode selected by the user of said language processing device; and an input buffer containing data representing key strokes used in specifying a message unit; a candidate buffer configured for storing candidate interpretations of user input gestures; a word buffer configured for storing message units specified by said user; a component buffer configured for storing data components of message units; an input interpretation database containing input gesture data; and a font store containing data representing properly represented characters... wherein said processing and memory module is configured to perform language-specific tasks at the request of the appliance by: receiving an instruction for language-specific processing from the appliance in the form of an application program interface (API) call, wherein said API call references said plurality of discrete memory locations."

Ito involves a GPS navigation system that includes a plurality of dictionaries for switching between output languages. However, Ito does not does not organize a speech module into a plurality of discrete memory locations based on a specific API call that references the memory locations, nor does the Examiner suggest that he does.

**Claim Rejections under 35 U.S.C. § 103 – Coon, Crupi, Ito in view of Bellegarda**

Also within the Office Action, Claims 8-9 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Coon in view of Crupi, Ito, and further in view of United States Patent No.: 6,208,971 to Bellegarda et al. (hereinafter referred to as "Bellegarda"). The Applicants respectfully traverse this rejection, because neither Coon, Crupi, Ito, nor Bellegarda, either alone or in combination, disclose all of the limitations of Claims 8-9.

As explained above, neither Coon, Crupi , nor Ito teach or suggest a "language processing device comprising a processing and memory module ... configured with a plurality of discrete memory locations comprising each of: a settings memory containing data representing operational parameters including each of: a language setting comprising one or more language selected by the user of said language processing device; and an input mode setting comprising one or more input mode selected by the user of said language processing device; and an input buffer containing data representing key strokes used in specifying a message unit; a candidate buffer configured for storing candidate interpretations of user input gestures; a word buffer configured for storing message units specified by said user; a component buffer configured for storing data components of message units; an input interpretation database containing input gesture data; and a font store containing data representing properly represented characters... wherein said processing and memory module is configured to perform language-specific tasks at the request of the appliance by: receiving an instruction for language-specific processing from the appliance in

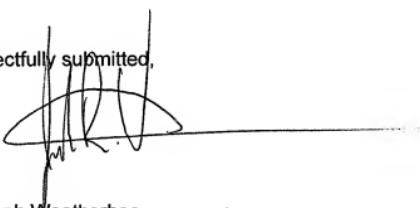
the form of an application program interface (API) call, wherein said API call references said plurality of discrete memory locations."

Bellegarda involves a speech recognition system that includes a training scheme. However, Ito does not does not organize a speech module into a plurality of discrete memory locations based on a specific API call that references the memory locations, nor does the Examiner suggest that he does.

### CONCLUSION

Applicant respectfully posits that the pending claims have been distinguished from the art of record, and that all objections to and rejections of the claims have been overcome. Accordingly, Applicant respectfully requests allowance. Should the Examiner deem it helpful he is encouraged to contact Applicant's attorney, at (650) 474-8400.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "JOSEPH WEATHERBEE", is written over a stylized, symmetrical flourish.

Joseph Weatherbee

Reg. No. 64,810

Customer No. 22862